

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

Eluster Miller and Angela W. Miller,)	
)	
Plaintiffs,)	
)	COMPLAINT
vs.)	Civil Action No.: _____
)	
Newton Wesley Farley,)	
)	
Defendant.)	

Plaintiffs would respectfully show unto this Court:

1. Plaintiffs are citizens and residents of the state of South Carolina, County of Spartanburg.
2. Plaintiffs are informed and believe that the Defendant is a citizen and resident of Chesapeake, Virginia.
3. Venue is appropriate in the Spartanburg Division of the District Court of South Carolina, pursuant to 28 U.S.C. § 1391.
4. On or about July 26, 2019, Plaintiffs and Defendant were traveling in Chatham County, Georgia when the Defendant drove his vehicle into the rear of the vehicle being driven by the Defendant.
5. As a direct and proximate result, the Plaintiffs have suffered great physical and mental harm and injuries, all of which has caused and will in the future cause them endure great physical and mental pain and suffering, to undergo medical treatment, to undergo the administration of strong and potent medications and to spend money for medical

services, as well as loss of consortium.

6. The injuries and damages suffered by the Plaintiffs herein were the direct and proximate result of the following negligent, wilful, wanton, careless, reckless and grossly negligent acts on the part of the Defendant herein at the time and place above mentioned:

- a) Following too closely;
- b) Failing to apply brakes, if any he had;
- c) Failing to keep his vehicle under proper control;
- d) Traveling too fast for conditions;
- e) Such other particulars as may be learned during discovery or at the trial of this matter.

7. Plaintiffs are informed and believe that they are entitled to judgment against the Defendant for such actual and punitive damages as the jury may determine.

WHEREFORE, Plaintiffs pray judgment against the Defendant for such actual and punitive damages as the jury may determine, for the costs of this action and for such other and further relief as the Court may deem just and proper.

THE ANTHONY LAW FIRM, P.A.

/s/ Kenneth C. Anthony, Jr. _____

Kenneth C. Anthony, Jr.

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Spartanburg, SC